

REMARKS

The Office Action of March 22, 2006 was received and reviewed. The Examiner is thanked for considering the application. Reconsideration and withdrawal of the currently pending rejections are requested for the reasons advanced in detail below.

Prior to this Amendment, claims 50-57 and 62-91 were pending in the instant application. By this Amendment, claims 53 and 57 have been canceled in their entirety without prejudice nor disclaimer of the subject matter set forth therein, and claims 50, 52, 62-63 and 65-91 have been amended. Accordingly, claims 50-52, 54-56, 62-91 are pending, of which claims 50, 52, 62, 65, 68, 70, 72, 74, 76, 78 and 80 are independent.

In the detailed Office Action, claims 68-69, 74-75, and 83-91 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. The Examiner asserted that the claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors at the time of the application was filed, has possession of the claimed invention. Particularly, the Examiner asserted that there is no description in the original disclosure for forming the resin film as recited, and the Examiner cited Fig. 5B wherein resin film 945 is formed to contact wiring 937/938. In response, Applicants respectfully direct the Examiner's attention to Fig. 6A, for example, which discloses bank 947 formed from resin film 945 that is over the wiring (e.g., 942, 943) the pixel electrode (944) and the interlayer insulating film (e.g., 935). Further support for the resin film as recited can be found in, e.g., page 18, lines 17-30, as well as in claims 50, 52, 62, etc that the Examiner do not reject.

As best as Applicants can understand the §112, first paragraph rejection, Applicants note that Figs. 5B and 5C does not show the pixel electrode 944 and, hence, the described method in the specification appears lacking of support to the Examiner. If Figs. 5B and 5C are the reason for the Examiner's §112, first paragraph, rejection of claims 68, 69, 74, 75 and 83-91, then Applicants believe an objection to the drawings would be more appropriate. Further, if Applicants' remarks above with respect to the §112, first paragraph, rejection does not address the Examiner's concern, Applicants would respectfully request the Examiner to further clarify the reason for such a rejection.

Claims 50-53, 56-57, 62, 64-65, 67, 76-80 and 82 stand rejected under 35 U.S.C. §103(a) as being unpatentable over AAPA in combination with Yamada (U.S. Patent No.

6,246,179), Inoue et al. (U.S. Patent No. 6,218,206 – hereafter Inoue), So et al. (U.S. Patent No. 5,853,905 – hereafter So), Garcia et al. (U.S. Patent No. 6,308,369 – hereafter Garcia), Farber et al. (U.S. Patent No. 6,187,684 – hereafter Farber) and further in view of Satoh et al. (U.S. Patent No. 4,819,334 – hereafter Satoh) and Sakata et al. (U.S. Patent No. 6,120,584 – hereafter Sakata). The rejection is a repeat of the rejection in the Office Action mailed September 2, 2005.

Further, claims 54, 55, 63, 66, 70-73, 79 and 81 stand rejected under 35 U.S.C. §103(a) as being unpatentable over AAPA in combination with Yamada, Inoue, So, Garcia, Farber, Satoh, Sakata and further in view of Montgomery et al. (U.S. Patent Application Publication No. 2002/0071995 – hereafter Montgomery). This rejection is a repeat of the rejection issued in the Office Action mailed September 2, 2005. The obviousness rejections are respectfully traversed at least for the reasons provided below.

Initially, Applicants have amended the claims, as shown above, to further clarify the claim language and to further distinguish over the cited prior art references. As submitted in the Amendment filed January 3, 2006, the application of Satoh is improper. In this Amendment, Applicants respectfully re-iterate that the application of Satoh in the pending rejections is still improper for the reasons provided below. In order to keep this Response concise, Applicants remarks in the Amendment filed January 3, 2006 are not repeated but are incorporated herein by reference.

Applicants note that each of the independent claims recites a feature of: forming a resin insulating film over a wiring, a pixel electrode, and an interlayer insulating film; after forming the resin insulating film, forming a protective film (or a film, a film comprising a conductive material, a film comprising an insulating material) over the resin insulating film; after forming the protective film, moving the substrate over which the thin film transistor is formed from a first processing room to a second processing room.

Further, each of claims 50, 62, 65, 72, and 78 has a feature of: after moving the substrate, removing the protective film; after removing the protective film, forming a bank by etching the resin insulating film. According to the claimed invention, in the step of moving, not only the protective film but also the resin insulating film are formed over a thin film transistor, the wiring, and the pixel electrode. Applicants respectfully note that there is an advantage in that not only the protective film but also the resin insulating film can prevent a

substrate over which the thin film transistor, the wiring, and the pixel electrode are formed from a problem such as contamination and electrostatic discharge damage.

On the other hand, although Satoh disclose that the protective film 10 is used for preventing an element formed over the substrate 1 from contamination, Satoh does not teach, disclose or suggest the film corresponding to the resin insulating film of the claimed invention because the film 5 of Satoh is patterned before forming the protective film 10.

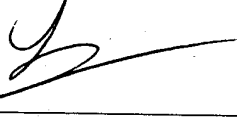
In view of above, Applicants respectfully assert that the rejections applying Satoh are not appropriate.

Further, Applicants respectfully assert that there is no motivation for combining Sakata and Satoh. Although Sakata recognizes a problem occurred in the half-finished substrate and provide a filter for a clean room, Sakata does not recognize the problem of electrostatic discharge damage and do not intend to preventing the problems of contamination and electrostatic discharge damage by forming "a film" over the thin film transistor, the wiring, and the pixel electrode, and there is no motivation for applying Satoh's protective film 10 to Sakata et al. Therefore, Applicants respectfully assert that the rejections applying Sakata and Satoh are also not appropriate.

With reference to the IDS filed May 11, 2005, although the Examiner initialed and considered the U.S. patent references on August 31, 2005, the Examiner has not considered the foreign publication listed in the same Form PTO-1149 because the Examiner believes that no copies of the foreign publication were provided. However, Applicants have reviewed the file history in PAIRS, and the references were received and scanned. As a courtesy to the Examiner, and for the Examiner's convenience, Applicants provide herewith copies of the eight (8) foreign references that have been downloaded from PAIRS. Applicants respectfully request the Examiner to consider these reference, to initial the IDS filed May 11, 2005 and to provide a copy of the initialed Form PTO-1449 to Applicants.

In view of the foregoing, it is respectfully requested that the rejections of record be reconsidered and withdrawn by the Examiner, that claims 50-52, 54-56, and 62-91 be allowed and that the application be passed to issue. If a conference would expedite prosecution of the instant application, the Examiner is hereby invited to telephone the undersigned to arrange such a conference.

Respectfully submitted,



Luan C. Do
Registration No. 38,434

NIXON PEABODY LLP
Suite 900, 401 9th Street, N.W.
Washington, D.C. 20004-2128
(202) 585-8000